

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, State Bar Number 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE GROUP, INC. and
20 COMMONWEALTH LAND TITLE INSURANCE COMPANY

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Gary L. Compton, State Bar No. 1652
24 2950 E. Flamingo Road, Suite L
25 Las Vegas, Nevada 89121

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 US BANK NATIONAL ASSOCIATION,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00181-APG-EJY

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

FIRST REQUEST

COMES NOW defendants Fidelity National Title Group, Inc. ("FNTG") and
Commonwealth Land Title Insurance Company ("Commonwealth") (collectively "Defendants")
and plaintiff U.S. Bank, National Association ("U.S. Bank"), by and through their respective
attorneys of record, which hereby agree and stipulate as follows:

1 1. On January 14, 2021 U.S. Bank filed its complaint in the Eighth Judicial District
2 Court for the State of Nevada;

3 2. On February 2, 2021, Commonwealth removed the instant case to the United
4 States District Court for the State of Nevada (ECF No. 1);

5 3. Commonwealth's response to U.S. Bank's complaint is currently due on March 2,
6 2021, while FNTG's response is due on March 10, 2021;

7 4. Counsel for Defendants request a 30-day extension for Commonwealth (22 days
8 for FNTG) through and including Thursday, April 1, 2021 for Defendants to file their respective
9 responses to U.S. Bank's complaint to afford Defendants' counsel additional time to review and
10 respond to U.S. Bank's complaint.

11 5. Counsel for U.S. Bank does not oppose the requested extension;

12 6. This is the first request for an extension made by counsel for Defendants, which is
13 made in good faith and not for the purposes of delay.

14 7. This stipulation is entered into without waiving any of Defendants' objections
15 under Fed. R. Civ. P. 12.

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint is hereby extended through and including Thursday, April 1, 2021.

3 Dated: February 26, 2021

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR

Attorneys for Defendants

7 FIDELITY NATIONAL TITLE GROUP,
8 INC. and COMMONWEALTH LAND TITLE
INSURANCE COMPANY

9 Dated: February 26, 2021

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Darren T. Brenner

DARREN T. BRENNER

Attorneys for Plaintiff

12 U.S. BANK, NATIONAL ASSOCIATION

13 **IT IS SO ORDERED.**

14 Dated this 26th day of February, 2021.

15 

16 ELAYNA J. YOUCHAH

17 UNITED STATES MAGISTRATE JUDGE